

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>  <b>W. R. GRACE &amp; CO., et al.,</b>  <i>Debtors.</i>	<b>§</b> <b>§</b> <b>§</b> <b>§</b> <b>§</b> <b>§</b> <b>§</b>	<b>Chapter 11</b>  <b>Case No. 01-01139 (JKF)</b>  <b>Jointly Administered</b>  <b>Objection Deadline: 8/5/2010; 4:00 p.m. ET</b> <b>Hearing Date: 9/13/2010; 10:30 a.m. ET</b>
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**AMENDED SIXTH QUARTERLY APPLICATION OF HON. ALEXANDER M. SANDERS, JR., THE LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS AND HOLDERS OF DEMANDS FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT OF EXPENSES FOR THE 36<sup>TH</sup> QUARTERLY PERIOD FROM JANUARY 1, 2010 THROUGH MARCH 31, 2010**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the Hon. Alexander M . Sanders, Jr., pursuant to sections 327, 330 and 331 of title 11 of the United States Code (the "Bankruptcy Code"), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the Appointment Order (as defined below), the Administrative Order Under 11 U.S.C. §§105(a) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Professionals and Official Committee Members (the "Interim Compensation Order"), the Amended Administrative Order under 11 U.S.C. §§105(a) and 331 Establishing Revised Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Official Committee Members (the "Amended Interim Compensation Order") and Del. Bankr. LR 2016-2, and hereby applies for an order allowing him (i) compensation in the amount of \$26,685.00 for the reasonable and necessary services he has rendered as the Legal Representative for Future Asbestos-Related Property

Damage Claimants and Holders of Demands and (ii) reimbursement of actual and necessary expenses that he has incurred in the amount of \$3,022.32, for a total of \$29,707.32 or one hundred percent (100%) of all compensation and expense reimbursement requested, for the period January 1, 2010 through March 31, 2010 (the "Sixth Quarterly Fee Application"), and in support of this Sixth Quarterly Fee Application, would respectfully show as follows:

SUMMARY

Name of Applicant:	Alexander M. Sanders, Jr.,
Authorized to Provide Services To:	Future Asbestos-Related Property Damage Claimants and Holders of Demands
Date of Retention:	October 20, 2008, <i>nunc pro tunc</i> to September 22, 2008
Period for Which Compensation and Reimbursement is Sought:	January 1, 2010 through March 31, 2010
Amount of Fees Sought as Actual Reasonable and Necessary:	\$26,685.00
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$3,022.32

This is a(n):   ☐Monthly   ☒Quarterly   ☐Interim   ☐Final Application

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees <sup>1</sup>	Requested Expenses	Status of Fees	Status of Expenses
2/26/2009	Inception to 2-26-2009	\$15,428.00	\$0	Paid	Paid
4/6/2009	2-26-2009 to 3-31-2009	\$17,892.00	\$2,305.49	Paid	Paid
5/27/2009	4-1-2009 to 4-30-2009	\$864.00	\$0	Paid	Paid
6/5/2009	5-1-2009 to 5-31-2009	\$16,308.00	\$747.20	Paid	Paid
7/23/2009	6-1-2009 to 6-30-2009	\$2,844.00	\$0	Paid	Paid
10/7/2009	7-1-2009 to 7-31-2009	\$8,460.00	\$0	Paid	Paid
10/7/2009	8-1-2009 to 8-31-2009	\$3,168.00	\$0	Paid	Paid
10/7/2009	9-1-2009 to 9-30-2009	\$38,304.00	\$3,904.58	Paid	Paid
11/4/2009	10-1-2009 to 10-31-2009	\$11,664.00	\$1,336.21	Paid	Paid
12/7/2009	11-1-2009 to 11-30-2009	\$5,292.00	\$0	Paid	Paid
1/7/2010	12-1-2009 to 12-31-2009	\$1,440.00	\$37.00	Paid	Paid
2/9/2010	1-1-2010 to 1-31-2010	\$18,972.00	\$2,992.32	Paid	Paid
3/12/2010	2-1-2010 to 2-28-2010	\$360.00	\$30.00	Paid	Paid
4/20/2010	3-1-2010 to 3-31-2010	\$2,016.00	\$0	Paid	Paid
5/5/2010	4-1-2010 to 4-30-2010	\$1,332.00	\$72.00	Paid	Paid
6/3/2010	5-1-2010 to 5-31-2010	\$2,484.00	\$0	Paid	Paid

Alexander M. Sanders, Jr. is the only professional providing services in this Fee Application period. Judge Sanders has practiced law for over 40 years, and the billing rate for the time period of this application was \$450 per hour. In this Sixth Quarterly Application period

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<sup>1</sup> At 80% of the total incurred.

Judge Sanders billed 59.3 hours,<sup>2</sup> for a total amount billed of \$26,685.00, of which 80% (\$21,348.00) has already been paid or has payment pending, leaving the amount not yet approved or paid of \$5,337.00.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Disclosure Statement and Confirmation	46.0	\$20,700.00
Travel	25.0 (@100%)	\$5,625.00 (@50%)
Fee Applications	0.8	\$360.00
<b>TOTAL</b>	<b>71.8</b>	<b>\$26,685.00</b>

EXPENSE SUMMARY

Description	Expense
Travel	\$2,910.49
Court Call	\$30.00
Copying	\$81.83
<b>TOTAL</b>	<b>\$3,022.32</b>

APPLICATION

1. On April 2, 2001, (the "Petition Date") each of the Debtors filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Bankruptcy Code (the "Chapter 11 Cases"). On April 2, 2001, the Court entered an order procedurally consolidating the Chapter 11 Cases for administrative purposes only. Since the Petition Date, the Debtors are continuing to operate their businesses and manage their properties and assets as

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<sup>2</sup> Non-Productive travel time is included in this figure, but at 50% of the actual time.

debtors-in-possession pursuant to sections 1107(a) and 1108 of the United States Bankruptcy Code.

2. On May 3, 2001 , the Court entered an Interim Compensation Order, as amended by the Amended Interim Compensation Order, establishing procedures for monthly compensation and reimbursement of expenses of professionals (each such application, a "Monthly Fee Application"), and whereby any notice party listed in the Amended Interim Compensation Order may object to such Monthly Fee Application. If no notice party objects to professional's Monthly Fee Application within twenty (20) days after the date of service of the Monthly Fee Application, the applicable professional may submit to the Court a certification of no objection authorizing the interim compensation and reimbursement of eighty percent (80%) of the fees requested and one hundred percent (100%) of the expenses requested, subject to the filing and approval of the interim and final fee applications of the professional.

3. Furthermore, and also pursuant to the Amended Interim Compensation Order, within forty-five (45) days of the end of each quarter, professionals are required to file and serve, upon the notice parties, a quarterly request (a "Quarterly Fee Application") for interim Court approval and allowance of the Monthly Fee Applications filed during the quarter covered by that Quarterly Fee Application. If the Court grants the relief requested by the Quarterly Fee Application, the Debtors are authorized and directed to pay the professional 100% of the fees and expenses requested in the Monthly Fee Applications covered by that Quarterly Fee Application, less any amounts previously paid in connection with the Monthly Fee Applications. Any payment made pursuant to the Monthly Fee Applications or a Quarterly Fee Application is subject to final approval of all fees and expenses at a hearing on the professional's final fee

application.

4. By an October order of this Court, later made *nunc pro tunc* as of September 22, 2008, the PD FCR was appointed by the Court (the "Appointment Order"). The Appointment Order authorizes the Debtors to compensate Judge Sanders at his hourly rate charged for services of this type and to be reimbursed for actual and necessary out-of-pocket expenses that he incurred, subject to application to this Court in accordance with the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, all applicable local rules and orders of this Court.

5. This Quarterly Fee Application, which is submitted in accordance with the Amended Interim Compensation Order, is Judge Sanders' Sixth Quarterly Fee Application for compensation for services rendered in connection with the Chapter 11 Cases and covers the fee period of January 1, 2010 through March 31, 2010 (the "Fee Period").

6. Judge Sanders has filed with the Court the following Monthly Fee Applications for interim compensation during the Fee Period:

- (a) Application of Hon. Alexander M. Sanders, Jr. For Compensation for Services and Reimbursement of Expenses as the Legal Representative for Future Asbestos-related Property Damage Claimants And Holders of Demands for the Twelfth Monthly Interim Period from January 1, 2010 Through January 31, 2010, seeking \$18,972.00 in fees (80% of \$23,715.00), and \$2,992.32 in expenses;
- (b) Application of Hon. Alexander M. Sanders, Jr. For Compensation for Services and Reimbursement of Expenses as the Legal Representative for Future Asbestos-related Property Damage Claimants And Holders of Demands for the Thirteenth Monthly Interim Period from February 1, 2010 Through February 28, 2010, seeking \$360.00 in fees (80% of \$450.00), and \$30.00 in expenses; and
- (c) Application of Hon. Alexander M. Sanders, Jr. For Compensation for Services and Reimbursement of Expenses as the Legal Representative for Future Asbestos-related Property Damage Claimants And Holders of Demands for the Fourteenth Monthly Interim Period from March 1, 2010 Through March 31, 2010, seeking \$2,016.00 in fees (80% of \$2,520.00).

7. The monthly fee applications covered by this Sixth Quarterly Fee Application contain detailed daily time logs describing the actual and necessary services provided by Judge Sanders during the Fee Period, as well as other detailed information required to be included in fee applications. The Twelfth, Thirteenth and Fourteenth monthly fee applications are attached hereto as Exhibits "1," "2" and "3," respectively.

8. The period for objecting to the fee and expense reimbursements relating to the Twelfth, Thirteenth and Fourteenth Monthly Fee Applications have passed without any objections being filed, whereupon Judge Sanders filed Certificates of No Objection with the Court, and Judge Sanders has been paid interim compensation and reimbursement of 80% of the fees and 100% of the expenses requested.

9. Judge Sanders has previously filed five Quarterly Fee Applications, all of which have been approved by the Court.

10. By this Sixth Quarterly Fee Application, Judge Sanders requests that the Court approve the interim allowance of compensation for professional services rendered and the reimbursement of actual and necessary expenses incurred by Judge Sanders from January 1, 2010 through March 31, 2010 and order the payment of the remaining amounts not yet paid, less any amounts previously paid to Judge Sanders pursuant to the Monthly Fee Applications and the procedures set forth in the Amended Interim Compensation Order. As stated above, the full scope of the services provided and the related expenses incurred are fully described in the Monthly Fee Applications that already have been filed with the Court.

11. Judge Sanders reserves his right to seek at a later date compensation for services rendered and expenses incurred during the applicable period that are not otherwise included in

the relevant monthly fee applications.

12. At all relevant times, Judge Sanders has been a disinterested person as that term is defined in Section 101(14) of the United States Bankruptcy Code, as modified by section 1107(b) of the United States Bankruptcy Code and has not represented or held an interest adverse to the interest of the Debtors.

13. All services for which compensation is requested by Judge Sanders were performed as the PD FCR and not on behalf of any committee, creditor, or other person.

14. Judge Sanders believes that this Sixth Quarterly Fee Application complies with the requirements of Del. Bankr. LR 2016-2 and the Amended Interim Compensation Order.

15. During the Interim Period, Judge Sanders has received no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with these Chapter 11 Cases, other than the interim compensation payments pursuant to the Amended Interim Compensation Order. There is no agreement or understanding between Judge Sanders and any other person for the sharing of compensation to be received for services rendered in these cases, other than normal intra-firm distributions at his law firm.

16. The professional services and related expenses for which Judge Sanders requests interim allowance of compensation and reimbursement of expenses were rendered and incurred in connection with these cases in the discharge of Judge Sanders' professional responsibilities as PD FCR in the Chapter 11 Cases. Judge Sanders' services have been necessary and beneficial to future property damage claimants' as well as the Debtors and their estates, creditors, and other parties in interest.



17. Pursuant to Fed R. Bankr. P. 2016(b), other than normal intra-firm distributions at his law firm, Judge Sanders has not shared, nor has agreed to share: (a) any compensation it has received or may receive with another party or person, or (b) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

WHEREFORE, Hon. Alexander M. Sanders, Jr. respectfully requests that the Court enter an order, providing that (a) for the period from January 1, 2010 through March 31, 2010, an administrative allowance be made to Judge Sanders in the sum of \$26,685.00 as compensation for reasonable and necessary professional services rendered as the PD FCR and \$3,022.32 in expenses; (b) that the Debtors be authorized and directed to pay to Judge Sanders the outstanding amount of such sums, less any sums previously paid to Judge Sanders pursuant to the Monthly Fee Applications and the procedures set forth in the Amended Interim Compensation Order and (c) this Court grant such other and further relief to which Judge Sanders is justly entitled.

Respectfully Submitted,



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Alan B. Rich, Esq.  
Texas Bar No. 16842350  
4244 Renaissance Tower  
1201 Elm Street  
Dallas, Texas 75270  
(214) 744-5100  
(214) 744-5101 [fax]  
[arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

COUNSEL TO HON. ALEXANDER  
M. SANDERS, JR., LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY  
DAMAGE CLAIMANTS AND HOLDERS  
OF DEMANDS

DECLARATION

Alan B. Rich, declares as follows:

I am the counsel hired by the PD FCR with the approval of the Court, and am familiar with the services that the PD FCR rendered. I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. I believe that this Application substantially complies with Local Bankruptcy Rules for the District of Delaware.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 16, 2010.



**CERTIFICATE OF SERVICE**

I certify that on the 16<sup>th</sup> day of February, 2010, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.

A handwritten signature in black ink, appearing to read "MBRIL", is positioned above a horizontal line.

# **EXHIBIT 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>W. R. GRACE &amp; CO., et al.,</b>	§	<b>Case No. 01-01139 (JKF)</b>
	§	
<b><i>Debtors.</i></b>	§	<b>Jointly Administered</b>
	§	
	§	<b>Objection Deadline: 3/1/2010</b>
	§	<b>Hearing Date: TBD (if needed)</b>

**SUMMARY OF TWELFTH APPLICATION OF ALEXANDER M. SANDERS, JR.  
FOR COMPENSATION FOR SERVICES AND REIMBURSEMENT  
OF EXPENSES AS THE LEGAL REPRESENTATIVE FOR  
FUTURE ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS  
AND HOLDERS OF DEMANDS FOR THE PERIOD  
FROM JANUARY 1, 2010 THROUGH JANUARY 31, 2010**

Name of Applicant:	Hon. Alexander M. Sanders, Jr.,
Authorized to Provide Services To:	Future Asbestos-Related Property Damage Claimants and Holders of Demands
Date of Retention:	October 20, 2008, <i>nunc pro tunc</i> to September 22, 2008
Period for Which Compensation and Reimbursement is Sought:	January 1, 2010 to January 31, 2010
Amount of Fees Sought as Actual Reasonable and Necessary:	\$18,972.00 [80% of \$23,715.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$2,992.32
This is a(n): <input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application	

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees <sup>1</sup>	Requested Expenses	Status of Fees	Status of Expenses
2/26/2009	Inception to 2-26-2009	\$15,428.00	\$0	Paid	Paid
4/6/2009	2-26-2009 to 3-31-2009	\$17,892.00	\$2,305.49	Paid	Paid
5/27/2009	4-1-2009 to 4-30-2009	\$864.00	\$0	Paid	Paid
6/5/2009	5-1-2009 to 5-31-2009	\$16,308.00	\$747.20	Paid	Paid
7/23/2009	6-1-2009 to 6-30-2009	\$2,844.00	\$0	Paid	Paid
10/7/2009	7-1-2009 to 7-31-2009	\$8,460.00	\$0	Paid	Paid
10/7/2009	8-1-2009 to 8-31-2009	\$3,168.00	\$0	Paid	Paid
10/7/2009	9-1-2009 to 9-30-2009	\$38,304.00	\$3,904.58	Paid	Paid
11/4/2009	10-1-2009 to 10-31-2009	\$11,664.00	\$1,336.21	Paid	Paid
12/7/2009	11-1-2009 to 11-30-2009	\$5,292.00	\$0	Paid	Paid
1/7/2010	12-1-2009 to 12-31-2009	\$1,440.00	\$37.00	CNO Filed	CNO Filed

Hon. Alexander M. Sanders, Jr. is the only professional providing services in this Fee Application period. Judge Sanders has practiced law for over 40 years, and his present billing rate is \$450 per hour. In this Application period Judge Sanders performed 52.7 hours<sup>2</sup> of services as PD FCR, for a total amount billed of \$23,715.00, of which 80% is currently sought, in the amount of \$18,972.00, plus expenses in the amount of \$2,992.32.

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<sup>1</sup> At 80% of the total incurred.

<sup>2</sup> Travel time is included in this figure at 50% of actual time.

This is the Twelfth Application for monthly fees and expenses.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	40.2 hours	\$18,090.00
Travel	25.0 hours (@ 100%)	\$5,625.00 (@ 50%)
<b>TOTAL</b>	<b>65.2 hours</b>	<b>\$23,715.00</b>

Detail of the fees and expenses are attached hereto as Exhibit A.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, attorney for the PD FCR, and a professional person seeking approval of this Monthly Fee Application on behalf of his client, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



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Alan B. Rich, Esq.  
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COUNSEL TO ALEXANDER  
M. SANDERS, JR., LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY  
DAMAGE CLAIMANTS AND HOLDERS  
OF DEMANDS

**CERTIFICATE OF SERVICE**

I certify that on the 9<sup>th</sup> day of February, 2010, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.





# **EXHIBIT A**

*ALEXANDER M. SANDERS, JR.*  
*SANDERS & NETTLES, LLC*  
*Attorneys at Law*  
*208 Lincoln Street*  
*Columbia, South Carolina 29201*

*Mailing address: 19 Water Street*  
*Charleston, SC 29401*

**INVOICE FOR PROFESSIONAL SERVICES 1/1/10 – 1/31/10**

February 4, 2010

As Legal Representative for Future Asbestos-Related Property Damage Claimants and Holders of Demands

*In re W. R. Grace*, No. 01-1139 (Bankr.D.Del)

<u>Date</u>	<u>Services Performed</u>	<u>Time</u>
1/3/10	12 noon, left Charleston for Pittsburgh, arrived hotel 7:30 p.m. (7.4 hours billed @ one-half)	3.7
	8 p.m., left hotel for dinner with Dan Speights, re: objections of Anderson Memorial Hospital to the plan, returned to hotel 10:30 p.m.	2.5
1/4/10	8:30 a.m., left hotel for Court, 9 a.m. to 6 p.m. Court heard various arguments on objections to the plan. Lunch with Alan Rich, Esq., and Matthew Cramer, Esq., counsel for the PD Committee re: morning proceedings.	9.5
1/5/10	8 a.m., left hotel for Court, 8:30 a.m. to 6 p.m. Court continued to hear arguments on objections to the plan. Lunch with Alan Rich, Esq. re: morning proceedings.	10.0
1/6/10	8 a.m., left hotel for Court, 8:30 to 11:30 a.m. Court conclude hearing arguments on objections to the plan.	3.0
	11:30 a.m., left for airport, arrived Charleston 6:30 p.m. (7 hours billed @ one-half)	3.5

**INVOICE 1/1/10 – 1/31/10**

February 4, 2010

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1/7/10	Review of Zurich's withdrawal of certain pleadings	0.5
1/15/10	Review of documents, including:	
	Canadian ZAI Claimants' Application for the Appointment of Special Counsel and Attached Exhibits A, B and C (a total of 57 pages)	1.0
	PI FCR's Response	0.3
1/16/10	Review of documents, including:	
	Objection of the Crown to the Confirmation of the Plan (20 pages)	0.5
	Objection of the Crown to the Debtors' Disclosure Statement for the Plan and Motion for an Order (35 pages)	0.8
1/17/10	Review of various attachments, exhibits, etc., consisting mainly of proceedings in Canadian courts, accompanying Objections of the Crown. (A total of 950 pages.) <i>Cursory review only.</i>	2.5
1/20/10	Review of the CCAA Representative Counsel's Reply to the Objection of the Crown, with attachments (approx. 50 pages)	1.0
	Review of Grace's Exit Financing Motion, with engagement letters attached (approx. 25 pages) and Declaration of John James O'Connell in support of Grace's Exit Motion (7 pages)	0.8
1/21/10	Review of Plan Proponents' Response to Crown's Objection (77 pages)	1.3
1/24/10	Reviewed agenda for hearing in Wilmington.	0.5
	2:30 p.m., left Charleston for Wilmington, arrived hotel approx. 7 p.m. (4.6 hours billed @ one-half)	2.3
1/25/10	9 a.m., left hotel for Court, 9:30 a.m. to 3 p.m. Court heard various matters as per agenda. Lunch with Alan Rich, Esq., re: proceedings. Arrived at hotel 4 p.m.	6.0

**INVOICE 1/1/10 – 1/31/10**

February 4, 2010

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1/26/10	10 a.m., left hotel for airport. Arrived Charleston 4 p.m. (6 hours billed @ one-half)	3.0
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52.7 @ \$450/hour	\$	23,715.00
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Expenses (Detail attached)		2,992.32
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TOTAL:	\$	26,707.32
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Expenses  
(Receipts Attached, January 4, 2010)

Travel to Pittsburgh, PA, and return to Charleston, SC, for hearing before Judge Fitzgerald, January 4-6, 2010.

Taxi fares	\$ 40.00	(From airport to hotel)
	9.00	(From hotel to dinner)
	40.00	(From hotel to airport)
Airport parking	\$ 60.00	
Meals	\$ 110.00	(1/3, Dinner with Dan Speights, reduced from \$180.32)
	5.73	(1/4, Breakfast)
	47.80	(1/5, Lunch with Alan Rich and Matthew Kramer, counsel for PD Committee)
	13.75	(1/5, Dinner)
	4.47	(1/6, Breakfast)
Hotel	\$ 714.78	(1/3-1/6, total bill \$728.53, less \$13.75 previously charged for dinner 1/5)
Airfare	\$ 693.90	(Roundtrip Coach Airfare, plus change fees as a result of hearing being extended an additional day)
TOTAL	\$1,739.43	

Miscellaneous Expense  
(Receipt Attached, January 15, 2010)

Copying expense	\$ 81.83	(1/15)
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Expenses  
(Receipts Attached, January 24, 2010)

Travel to Wilmington, DE, and return to Charleston, SC, for hearing before Judge Fitzgerald, January 24-26, 2010.

Taxi fares	\$ 68.18	(From airport to hotel)
	80.00	(From hotel to airport)
Airport parking	\$ 45.00	
Meals	\$ 25.00	(1/25, Breakfast, reduced From \$31.50)
	4.48	(1/26, Breakfast – indicated on hotel bill)
Hotel	\$ 371.50	(1/24-1/26, total bill \$403.30, less \$31.50 previously charged for breakfast on 1/25)
Airfare	\$ 576.90	(Roundtrip Coach Airfare)
 TOTAL	 \$1,171.06	

# **EXHIBIT 2**



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>W. R. GRACE &amp; CO., et al.,</b>	§	<b>Case No. 01-01139 (JKF)</b>
	§	
<b><i>Debtors.</i></b>	§	<b>Jointly Administered</b>
	§	
	§	<b>Objection Deadline: 4/1/2010</b>
	§	<b>Hearing Date: TBD (if needed)</b>

**SUMMARY OF APPLICATION OF HON. ALEXANDER M. SANDERS, JR.,  
THE LEGAL REPRESENTATIVE FOR FUTURE ASBESTOS-RELATED  
PROPERTY DAMAGE CLAIMANTS AND HOLDERS OF DEMANDS FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES FOR THE THIRTEENTH MONTHLY INTERIM  
PERIOD FROM FEBRUARY 1, 2010 THROUGH FEBRUARY 28, 2010**

Name of Applicant:	Hon. Alexander M. Sanders, Jr.,
Authorized to Provide Services To:	Future Asbestos-Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 22, 2008 ( <i>nunc pro tunc</i> )
Period for Which Compensation and Reimbursement is Sought:	February 1, 2010 through February 28, 2010
Amount of Fees Sought as Actual Reasonable and Necessary:	\$360.00 [80% of \$450.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$30.00
This is a(n):	<input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application

PRIOR APPLICATIONS

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6/5/2009	5-1-2009 to 5-31-2009	\$16,308.00	\$747.20	Paid	Paid
7/23/2009	6-1-2009 to 6-30-2009	\$2,844.00	\$0	Paid	Paid
10/7/2009	7-1-2009 to 7-31-2009	\$8,460.00	\$0	Paid	Paid
10/7/2009	8-1-2009 to 8-31-2009	\$3,168.00	\$0	Paid	Paid
10/7/2009	9-1-2009 to 9-30-2009	\$38,304.00	\$3,904.58	Paid	Paid
11/4/2009	10-1-2009 to 10-31-2009	\$11,664.00	\$1,336.21	Paid	Paid
12/7/2009	11-1-2009 to 11-30-2009	\$5,292.00	\$0	Paid	Paid
1/7/2010	12-1-2009 to 12-31-2009	\$1,440.00	\$37.00	Paid	Paid
2/9/2010	1-1-2010 to 1-31-2010	\$18,972.00	\$2,992.32	CNO Filed	CNO Filed

Hon. Alexander M. Sanders, Jr. is the only professional providing services in this Fee Application period. Judge Sanders has practiced law for over 40 years, and his present billing rate is \$450 per hour. In this Application period Judge Sanders performed 1.0 hour<sup>2</sup> of services as PD FCR, for a total amount billed of \$450.00, of which 80% is currently sought, in the amount of \$360.00, plus expenses in the amount of \$30.00.

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<sup>1</sup> At 80% of the total incurred.

<sup>2</sup> Travel time, if any, is included in this figure at 50% of actual time.

This is the Thirteenth Application for monthly fees and expenses.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	1.0 hour	\$450.00
TOTAL	1.0 hour	\$450.00

Detail of the fees and expenses are attached hereto as Exhibit A.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, attorney for the PD FCR, and a professional person seeking approval of this Monthly Fee Application on behalf of his client, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



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Alan B. Rich, Esq.  
Texas Bar No. 16842350  
4244 Renaissance Tower  
1201 Elm Street  
Dallas, Texas 75270  
(214) 744-5100  
(214) 744-5101 (fax)  
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COUNSEL TO ALEXANDER  
M. SANDERS, JR., LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY  
DAMAGE CLAIMANTS AND HOLDERS  
OF DEMANDS

**CERTIFICATE OF SERVICE**

I certify that on the 12<sup>th</sup> day of March, 2010, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.



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# **EXHIBIT A**

*ALEXANDER M. SANDERS, JR.*  
*SANDERS & NETTLES, LLC*  
*Attorneys at Law*  
*208 Lincoln Street*  
*Columbia, South Carolina 29201*

*Mailing address: 19 Water Street*  
*Charleston, SC 29401*

**INVOICE FOR PROFESSIONAL SERVICES 2/1/10 – 2/28/10**

As Legal Representative for Future Asbestos-Related Property Damage Claimants and Holders of Demands

*In re W. R. Grace*, No. 01-1139 (Bankr.D.Del)

<u>Date</u>	<u>Services Performed</u>	<u>Time</u>
2/16/10	Participation by telephone in the Omnibus Hearing before Judge Fitzgerald in Wilmington, DE.	0.8
2/19/10	Review of inquiry re: bondholders from Ronald D'Ambrosi	0.2
	1 @ \$450/hour	\$ 450.00
	Expenses (Receipt Attached)	30.00
	TOTAL:	\$ 480.00

Expenses

Conference appearance by telephone before Judge Fitzgerald, 2/16/10. \$30.00

# **EXHIBIT 3**



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>W. R. GRACE &amp; CO., et al.,</b>	§	<b>Case No. 01-01139 (JKF)</b>
	§	
<b><i>Debtors.</i></b>	§	<b>Jointly Administered</b>
	§	
	§	<b>Objection Deadline: 5/10/10</b>
	§	<b>Hearing Date: TBD (if needed)</b>

**SUMMARY OF APPLICATION OF ALEXANDER M. SANDERS, JR. FOR  
COMPENSATION FOR SERVICES AND REIMBURSEMENT OF  
EXPENSES AS THE LEGAL REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY DAMAGE CLAIMANTS AND  
HOLDERS OF DEMANDS FOR THE FOURTEENTH MONTHLY INTERIM  
PERIOD FROM MARCH 1, 2010 THROUGH MARCH 31, 2010**

Name of Applicant:	Hon. Alexander M. Sanders, Jr.
Authorized to Provide Services To:	Future Asbestos-Related Property Damage Claimants and Holders of Demands
Date of Retention:	September 22, 2008 ( <i>nunc pro tunc</i> )
Period for Which Compensation and Reimbursement is Sought:	March 1, 2010 through March 31, 2010
Amount of Fees Sought as Actual Reasonable and Necessary:	\$2,016.00 [80% of \$2,520.00]
Amount of Expenses Sought as Actual, Reasonable and Necessary:	\$0.00
This is a(n):	<input checked="" type="checkbox"/> Monthly <input type="checkbox"/> Interim <input type="checkbox"/> Final Application

PRIOR APPLICATIONS

Date Filed	Period Covered	Requested Fees <sup>1</sup>	Requested Expenses	Status of Fees	Status of Expenses
2/26/2009	Inception to 2-26-2009	\$15,428.00	\$0	Paid	Paid
4/6/2009	2-26-2009 to 3-31-2009	\$17,892.00	\$2,305.49	Paid	Paid
5/27/2009	4-1-2009 to 4-30-2009	\$864.00	\$0	Paid	Paid
6/5/2009	5-1-2009 to 5-31-2009	\$16,308.00	\$747.20	Paid	Paid
7/23/2009	6-1-2009 to 6-30-2009	\$2,844.00	\$0	Paid	Paid
10/7/2009	7-1-2009 to 7-31-2009	\$8,460.00	\$0	Paid	Paid
10/7/2009	8-1-2009 to 8-31-2009	\$3,168.00	\$0	Paid	Paid
10/7/2009	9-1-2009 to 9-30-2009	\$38,304.00	\$3,904.58	Paid	Paid
11/4/2009	10-1-2009 to 10-31-2009	\$11,664.00	\$1,336.21	Paid	Paid
12/7/2009	11-1-2009 to 11-30-2009	\$5,292.00	\$0	Paid	Paid
1/7/2010	12-1-2009 to 12-31-2009	\$1,440.00	\$37.00	Paid	Paid
2/9/2010	1-1-2010 to 1-31-2010	\$18,972.00	\$2,992.32	Paid	Paid
3/12/2010	2-1-2010 to 2-28-2010	\$360.00	\$30.00	CNO Filed	CNO Filed

Alexander M. Sanders, Jr. is the only attorney providing services in this Fee Application period. Judge Sanders has practiced law for over 40 years, and his billing rate is \$450 per hour. In this Application period Judge Sanders billed 5.6 hours,<sup>2</sup> for a total amount billed of \$2,520.00 of which 80% is currently sought, in the amount of \$2,016.00.

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<sup>1</sup> At 80% of the total incurred.

<sup>2</sup> Non-Productive travel time, if any, is included in this figure, but at 50% of the actual time.

As stated above, this is the Fourteenth application for monthly fees and expenses. The time for preparation of this Application is approximately 1 hour, for which \$600.00 will be requested in a future application of my counsel.

COMPENSATION BY PROJECT CATEGORY

Project Category	Hours	Amount
Confirmation	4.8	\$2,160.00
Fee Applications	.8	\$360.00
TOTAL	5.6	\$2,520.00

EXPENSE SUMMARY

Description	Expense
TOTAL	\$0

Detail of the fees and expenses billed is attached hereto as Exhibit A.

CERTIFICATION OF COUNSEL PURSUANT TO LOCAL RULE 2016-2(f)

I, Alan B. Rich, a professional person seeking approval of this Monthly Fee Application, and having reviewed the requirements of Local Rule 2016-2, hereby certify that in my opinion, this Monthly Fee Application complies with Local Rule 2016-2.

Respectfully Submitted,



---

Alan B. Rich, Esq.  
Texas Bar No. 16842350  
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[arich@alanrichlaw.com](mailto:arich@alanrichlaw.com)

COUNSEL TO HON. ALEXANDER  
M. SANDERS, JR., LEGAL  
REPRESENTATIVE FOR FUTURE  
ASBESTOS-RELATED PROPERTY  
DAMAGE CLAIMANTS AND HOLDERS  
OF DEMANDS

**CERTIFICATE OF SERVICE**

I certify that on the 20<sup>th</sup> day of April, 2010, this document was served through the ECF system on all persons who have requested notice through the ECF system, and upon the special notice parties by electronic mail.



# EXHIBIT A

***ALEXANDER M. SANDERS, JR.***  
***SANDERS & NETTLES, LLC***  
***Attorneys at Law***  
***208 Lincoln Street***  
***Columbia, South Carolina 29201***

*Mailing address: 19 Water Street*  
*Charleston, SC 29401*

**INVOICE FOR PROFESSIONAL SERVICES 3/1/10 – 3/31/10**

April 19, 2010

As Legal Representative for Future Asbestos-Related Property Damage Claimants and Holders of Demands

*In re W. R. Grace*, No. 01-1139 (Bankr.D.Del)

<u>Date</u>	<u>Services Performed</u>	<u>Time</u>
3/10/10	Review of Fee Auditor's report for the period 7/1/09 – 9/30/09	0.5
3/22/10	Review of the following documents:	
	Order striking Motion to Intervene filed on behalf of Bernard Madoff	0.1
	Amended Notice of Agenda for March 22, 2010, hearing	0.3
	Certification of Counsel re: Canadian ZIA Claimants' Application for Appointment of Special Counsel and Application Authorizing the Retention of Daniel K. Hogan as Counsel	0.5
	Notice of Motion of Debtors for an Order Authorizing Settlement of Asbestos PD Claim by University of Guelph	0.5
	Notice of Motion for an Order Authorizing the Settlement of Asbestos PD Claim by Failmall Leaseholders, Inc.	0.5
	Notice of Motion of Debtors for an Order Authorizing the Settlement of Asbestos PD Claim by Conseillers Immobiliers GWL, Inc.	0.5

**INVOICE 3/1/10 – 3/31/10**

April 19, 2010

Page 2

	Notice of Motion of Debtors for an Order Authorizing the Settlement of Asbestos PD Claim by Avalon East School Board	0.5
	Notice of Motion of Debtors for an Order Authorizing the Settlement of Asbestos PD Claim by Atlantic Shopping Centres, Ltd.	0.5
	Notice of Motion of Debtors for an Order Authorizing the Settlement of Asbestos PD Claim by City of Vancouver	0.6
3/23/10	Review of subpart (vi) relating to 4th Set of Plan Modifications, applying to the PI Trust and possibly applying to PD Trust as well, as requested by the PI FCR	0.5
	Further review of multiple e-mail correspondence of March 22, 2010, regarding the above between Richard Wyron, Deanna Boll, Alan Rich, Ted Freedman, Jan Baer and Debra Felder	0.3
3/24/10	Review of last payment from Grace and correction of the amount (overpayment)	0.3

5.6 @ \$450/hour

\$ 2,520.00